

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION**

JEFFERY A. LAWSON,

Plaintiff,

V.

DETECTIVE ROBERT VERUCHI,  
Badge No. 167, named in his individual capacity,  
THE CITY OF ROCKFORD, an Illinois  
Municipal Corporation, and  
RICHARD A. MEYERS,  
named in his official capacity as  
Sheriff of Winnebago County,  
Illinois,

Defendants.

No. 08 C 50079

Judge Kapala

Magistrate Judge Mahoney

## REPORT OF PARTIES' PLANNING MEETING

1. The following persons participated in a Rule 26(f) conference on August 7, 2008 by telephonic conference: Matthew Tanner representing the plaintiff, Assistant City Attorney Angela Hammer representing defendants Veruchi and City of Rockford; and Assistant State's Attorney Martin Simpson representing Richard A. Meyers.

2. Initial Disclosures. The parties will complete by September 15, 2008 the initial disclosures required by Rule 26(a)(1).

3. Discovery Plan. The parties propose this discovery plan:

- a. Discovery will be needed on these subjects: Liability and damages.
- b. Discovery to commence on September 15, 2008, and fact discovery to be completed by March 13, 2009.
- c. Each party may serve a maximum of 25 interrogatories on other parties, with answers due 30 days after being served.

- d. Each party may serve a maximum of 30 requests for admission, with responses due 30 days after being served.
  - e. Each party may take a maximum of 10 depositions.
  - f. Unless otherwise stipulated or ordered by the court, each deposition is limited to 1 day of 3 hours.
  - g. The parties are not currently aware of whether expert testimony may be needed in this matter, and the parties propose that the issue of expert disclosure deadlines be reserved until the close of fact discovery.
  - h. The parties propose that deadlines for supplementations under Rule 26(e) be reserved.
4. Other items:
- a. Not Applicable.
  - b. Not Applicable.
  - c. Final date for plaintiff to amend pleadings or to join parties is April 15, 2009.
  - d. Final dates for defendants to amend pleadings or to join parties is May 15, 2009.
  - e. Dispositive motions to be filed by July 15, 2009.
  - f. Defendants have indicated they will need to conduct at least limited discovery before being in a position to evaluate settlement potential.
  - g. The parties are not currently aware of any alternative dispute resolution procedure that may enhance settlement prospects, but the parties will notify

the court if it appears that any such procedure, including the court's involvement, may be helpful.

- h. Parties to submit Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists by 30 days following rulings on dispositive motions.
- i. Objections under Rule 26(a)(3) to be filed within 30 days from service.
- j. The parties suggest a trial date at the Court's convenience, and estimate that the trial will take approximately one week.

Date: August 18, 2008

Respectfully submitted,

/s/ Matthew D. Tanner  
One of the Attorneys for Jeffery W. Lawson

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/s/ Angela Hammer  
One of the Attorneys for Det. Robert Veruchi  
and The City of Rockford

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/s/ Martin Simpson  
One of the Attorneys for Richard A. Meyers

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